REMARKS

Claims 1-10, 12-41 and 43-55 are pending in the Application and are now presented for examination. Claims 1, 22, 31, 37, 40 and 52 have been amended. Claims 11 and 42 have been cancelled, without prejudice and without disclaimer of subject matter. No new matter has been added.

Claims 1, 22, 31, 40 and 52 are independent.

Patentability under 35 U.S.C. §103

Claims 1, 3-5, 7-10, 21, 31, 33, 35-38 and 40

On page 3 of the Office Action, Claims 1, 3-5, 7-10, 21, 31, 33, 35-38 and 40 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. patent No: 6,215,519 to Nayar *et al.* Applicants respectfully disagree.

Independent Claim 1

Amended Claim 1 recites the features of a motion detector being configured to "determine multiple detection areas in the next video frame, the multiple detection areas corresponding to the differences in the next video frame; sequence between views corresponding to the multiple detection areas" and a "plurality of sequenced detector output signals corresponding to an associated one of the multiple detection areas."

In the present invention, a first, .i.e., base, and a next video frame are analyzed to determine whether any differences can be found in the next video frame with respect to the first video frame. The motion detector determines areas of interest in the next frame, i.e. multiple detection areas in the next video frame, where the multiple detection areas correspond to the differences found between the first video frame and the next video frame. The motion detector

then provides signals to a video camera corresponding to the multiple detection areas to cause the camera to sequence between the views. By sequencing between multiple detection areas, the present invention advantageously improves the value of a video recording by capturing the largest amount of movement areas, given that they are more probable to be of value to security personnel.

In striking contrast, Nayar does not teach a motion detector that "when the next video frame is different than the first video frame: determine[s] multiple detection areas in the next video frame, the multiple detection areas corresponding to the differences in the next video frame . . . sequence[s] between views corresponding to the multiple detection areas" and provides a "plurality of sequenced detector output signals corresponding to an associated one of the multiple detection areas." Nayar merely shows that "when a region of interest within the monitored area is detected … one or more of the PTZ systems 20 are moved to view the region of interest and are used to obtain high-resolution, magnified images of that region." Col. 7, ll. 2-7. Simply moving a PTZ system to a region of interest is not the same as sequencing "between views corresponding to the multiple detection areas" based on "the **differences in the next video frame**." Nayar moves the PTZ system, but does not use a motion detector to develop a sequence. Nayar uses the motion detector to "communicate[] with an object tracking unit," which "communicates with a coordinate mapping unit," and says nothing with respect to the motion detector developing a sequence between views corresponding to the multiple detection areas that correspond to the **differences in the next video frame**. Col. 9, ll. 40-43.

Moreover, Nayar does not show that the motion detector provides "a plurality of sequenced detector output signals" that correspond "to an associated one of the multiple

detection areas." On page 4, the Office Action states that Nayar fails to explicitly disclose the multiple detection areas. Applicants agree. However, Applicants disagree with the position in the Office Action that it would have been obvious to implement multiple detection zones. Nayar simply uses the motion detector of a first imaging system to detect moving objects and then tracks the objects with a second imaging system. Col. 4, ll. 6-15. Nayar's motion detector does not sequence between views corresponding to multiple detection areas that have already been determined to be of interest and provide sequenced outputs. Nayar detects an object in motion and then tracks it, but does not sequence a motion detector between the interesting multiple detection areas and provide a sequenced output that correspond to the multiple detection areas corresponding to the differences found between the first and the next video frame. Nayer does not discuss sequencing and, unlike Claim 1, does not teach or suggest how a sequence can be developed, let alone why a detector would provide "a plurality of sequenced detector output signals." Applicant's respectfully assert that the Office Action's summary conclusion as to this point and the finding of obviousness is based on pure speculation and conjecture.

Applicants respectfully assert that Nayar does not teach, disclose or suggest a motion detector being configured to "determine multiple detection areas in the next video frame, the multiple detection areas, i.e. the differences in the next video frame; sequence between views corresponding to the multiple detection areas" and a "plurality of sequenced detector output signals corresponding to an associated one of the multiple detection areas," as recited in amended Claim 1. Applicants respectfully assert that amended Claim 1 is patentable over Nayar and respectfully request the rejection to this claim be withdrawn.

Independent Claims 31 and 40

Amended independent Claims 31 and 40 recite features similar to Claim 1. Claim 31 is directed toward a motion detector and Claim 40 is directed toward a method of monitoring a moving object corresponding to Claim 1. Specifically, Claims 31 and 40 recite the features of "when the next video frame is different than the first video frame: determine multiple detection areas in the next video frame, the multiple detection areas corresponding to the differences in the next video frame" and provide "plurality of sequenced detector output signals corresponding to an associated one of the multiple detection areas." As discussed above with respect to amended Claim 1, these features are not taught, disclosed or suggested by Nayar. These claims are therefore believed patentable, and Applicants respectfully request the rejections to these claims be withdrawn.

Dependent Claims 3-5, 7-10, 21, 33 and 35-38

Claims 3-5, 7-10, 21, 33 and 35-38 are each dependent directly or indirectly from one or another of independent Claims 1 and 31, discussed above. These claims recite additional limitations which, in conformity with the features of their corresponding independent claim, are not disclosed or suggested by the art of record. The dependent claims are therefore believed patentable. However, the individual reconsideration of the patentability of each claim on its own merits is respectfully requested.

Claims 12-19, 21, 22, 24, 25, 27-30, 39, 43-53 and 55

On page 5 of the Office Action, Claims 12-19, 21, 22, 24, 25, 27-30, 39, 43-53 and 55 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No: 6,215,519 to Nayer *et al.* (hereinafter referred to as "Nayar") in view of Egnal. Amended independent Claims 22 and 52 recites features similar to Claim 1. Claim 22 is directed toward a video surveillance system. Claim 56 is a method claim corresponding to Claim 22. Specifically, Claims 22 and 52 recite the features of "when the next video frame is different than the first video frame: determine multiple detection areas in the next video frame, the multiple detection areas corresponding to the differences in the next video frame; sequence between views corresponding to the multiple detection areas" and provide "sequenced detector output signals corresponding to an associated one of the multiple detection areas." As discussed above with respect to Claim 1, these features are not taught, disclosed or suggested by Nayar. These claims are therefore believed patentable, and Applicants respectfully request the rejection to these claims be withdrawn.

Claims 12-19, 20-22, 24, 25, 27-30, 32, 39, 41, 43-55 are each dependent directly or indirectly from one or another of independent Claims 1, 22, 31, 40 and 52, discussed above. These claims recite additional limitations which, in conformity with the features of their corresponding independent claim, are not disclosed or suggested by the art of record. The dependent claims are therefore believed patentable. However, the individual reconsideration of the patentability of each claim on its own merits is respectfully requested.

Dependent Claims 2, 6, 23, 26 and 34

On page 12 of the Office Action, Claims 2, 6, 23, 26 and 34 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. patent No: 6,215,519 to Nayer *et al.* and Egnal in view of U.S. Patent No: 6,830,38 to Kajino *et al.* Claims 2, 6, 23, 26 and 34 are each dependent directly from one or another of independent Claims 1, 22 and 31, discussed above. These claims recite additional limitations which, in conformity with the features of their corresponding independent claim, are not disclosed or suggested by the art of record. The dependent claims are therefore believed patentable. However, the individual reconsideration of the patentability of each claim on its own merits is respectfully requested.

Conclusion

For all of the above reasons, the claim objections are believed to have been overcome placing Claims 1-10, 12-41 and 43-55 in condition for allowance, and reconsideration and allowance thereof is respectfully requested.

Of note, Applicants' undersigned representative is registered to practice before the United States Patent & Trademark Office. In accordance with 37 C.F.R. § 1.34 and M.P.E.P. § 405, the signature of Applicants' undersigned representative is representation that he is authorized to represent Applicants and the assignee on whose behalf he is acting.

The Examiner is encouraged to telephone the undersigned to discuss any matter that would expedite allowance of the present application.

The Commissioner is hereby authorized to credit overpayments or charge payment of any additional fees associated with this communication to Deposit Account No: 502104.

Respectfully submitted,

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